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January 21, 2014

VIA ECF

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> Hon. Kiyo A. Matsumoto United States District Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

> > Re: Innovation Ventures LLC et al v. Ultimate One Distributing Corp. et al (12-cv-5354)(KAM)(RLM)

Dear Judge Matsumoto:

Our firm formerly represented Defendants Baseline Distribution, Inc. and David Flood, but we have since been replaced by the firm of Stern & Schurin LLP in this matter. Attorney Richard Schurin was previously an attorney with our firm, and he continues to represent Baseline Distribution and Mr. Flood, now through his new firm, Stern & Schurin. (See D.I. 651)

Accordingly, we request that you remove me as an attorney of record in this case.

We thank the Court for its attention to this request. If the Court has any questions or requires any further information, please contact me.

Respectfully submitted, GOTTLIEB, RACKMAN & REISMAN, P.C.

/s/Ariel Peikes Ariel S. Peikes (AP 9157) apeikes@grr.com

Cc: Richard Schurin, Esq. (via ECF and email)